

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

DARAIUS DUBASH, and DR. FARAZ HARSINI	§	
	§	
	§	
Plaintiffs,	§	CIVIL ACTION
	§	CASE NO. 4:23-cv-03556
v.	§	
	§	
CITY OF HOUSTON, TEXAS; HOUSTON DOWNTOWN PARK CORPORATION; OFFICER ROBERT DOUGLAS (# 7943), in his Individual capacity; OFFICER VERN WHITWORTH (# 7595), in his individual capacity; DISCOVERY GREEN CONSERVANCY f/k/a HOUSTON DOWNTOWN PARK CONSERVANCY; and BARRY MANDEL, in his individual capacity,	§	
	§	
	§	
Defendants.	§	
	§	

**DEFENDANTS' UNOPPOSED JOINT MOTION TO EXCEED PAGE LIMITS
FOR RESPONSIVE MEMORANDA OF LAW TO
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

TO THE HONORABLE JUDGE OF THE UNITED STATES DISTRICT COURT:

NOW COME, THE CITY OF HOUSTON; HOUSTON DOWNTOWN PARK CORPORATION; OFFICER ROBERT DOUGLAS (#7943) in his individual capacity; OFFICER VERN WHITWORTH (#7595), in his individual capacity; DISCOVERY GREEN CONSERVANCY f/k/a HOUSTON DOWNTOWN PARK CONSERVANCY; and BARRY MANDEL, in his individual capacity, (hereinafter collectively referred to as "the Defendants"), and move this Court to exceed page limits for their responsive Memoranda of Law [Docket No. 41] in support thereof, to Plaintiffs' Motion for Preliminary Injunction [Docket Nos. 13, 15] and in support thereof would respectfully show the Court as follows:

I. REQUEST TO EXCEED PAGE LIMITS

1. This action involves allegations by Plaintiffs that Defendants violated certain rights under the United States Constitution, and the Texas Religious Freedom Restoration Act (found generally at TEX. CIV. PRAC. & REM. CODE § 110.001, *et seq.*) which was filed on September 20 2023. *See* Docket No. 1.

2. On October 20, 2023, Plaintiffs filed their Motion for Preliminary Injunction. *See* Docket Nos. 13, 15. Plaintiffs' Memorandum of Law in Support exceeded the page limitations under the Court's Civil Procedures and leave was agreed upon by Defendants and granted by the Court on October 26, 2023. *See* Docket No. 17.

3. For the same reasons cited by Plaintiffs and to allow Defendants full opportunity to respond to the motion and its supporting memorandum, Defendants move the Court to allow it to exceed the page limits set forth by this Court by five pages. *See* Judge Andrew S. Hanen's Civil Procedures, Rule 7 (L)(1). Specifically, the page limit under the Court's Civil Procedures is 20 pages and Defendants seek leave to submit a Memorandum of Law no longer than 25 pages, exclusive of caption, tables of contents, and signature block.

4. Accordingly, Defendants respectfully request that the Memorandum of Law in Support [Docket No. 41] to exceed the 20-page limit.

5. Counsel for Plaintiffs have agreed to this Motion in exchange for a similar extension of page limit on their Reply. Defendants agree.

II. PRAYER FOR RELIEF

8. Accordingly, Defendants request that this motion be granted and the Memorandum of Law in Support of Defendants' Response to Plaintiffs' Motion for Preliminary Injunction exceed the page limit, and Plaintiffs be allowed five additional pages for their Reply.

Respectfully submitted,

s/ Andrew S. Holland
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**Attorneys for Houston Downtown Park
Corporation**

CERTIFICATE OF CONFERENCE

I, Laura Flores Macom, certify that today, December 27, 2023, I conferred with counsel of record for Plaintiffs via email regarding their position on this motion. They have agreed to the motion in exchange for a similar extension of page limit for their Reply, to which Defendants agree.

s/ Laura Flores Macom
LAURA FLORES MACOM

CERTIFICATE OF SERVICE

I, Laura Flores Macom, certify that today, December 27, 2023, I filed the Defendants' joint motion to exceed page limit with Next Gen CM/ECF, for filing and service upon all attorneys who have appeared.

s/ Laura Flores Macom
LAURA FLORES MACOM